



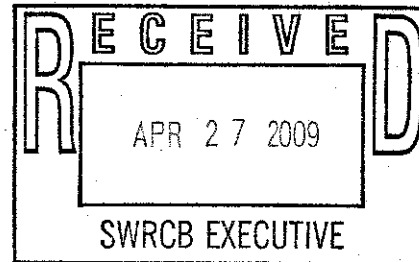
**Inland Empire Utilities Agency**  
A MUNICIPAL WATER DISTRICT

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April 27, 2009

Charles R. Hoppin, Chair and Members  
State Water Resources Control Board  
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Sacramento, CA 95814

ATTN: Jeanine Townsend, Clerk to the Board  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



Subject: Comments on draft *General Landscape Irrigation Permit*

Honorable Chair and Members of the Board;

Thank you for the opportunity to submit comments on the *draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water* (General Permit). We have reviewed the comments submitted jointly by the Association of California Water Agencies, the California Association of Sanitation Agencies and WaterReuse California (the Associations) and strongly support their suggested revisions in the next version of the draft General Permit.

The Inland Empire Utilities Agency (IEUA) has approximately 350 recycled water irrigation connections that serve approximately 4,000 acres in seven cities. Landscape irrigation with recycled water is currently provided to parks, schools, golf courses, parkways, medians and cemeteries as well as to our headquarters and 22-acre Chino Creek Wetlands and Educational Park. Permitting of the non-potable reuse projects takes place through our NPDES permit and through individual site review by the California Department of Public Health (DPH). Based on the successful track record of recycled water use in California we were hopeful that the General Permit would result in uniform permitting practices and provide a streamlined approach for watering grass and other landscapes with recycled water – similar to the approach taken under the “nationwide permits” in the 404 permit program for de minimus activities and the General Water Reuse Order issued by the San Francisco Regional Water Quality Control Board.

We are very concerned that the draft General Permit appears to be inconsistent with the Board’s recently adopted Statewide Recycled Water Policy and would exclude many existing landscape irrigation projects. Furthermore, there are provisions that seem to be contrary to current practice, unnecessarily prescriptive or redundant and overly burdensome for a permit to water grass and other landscapes with recycled water. In addition to the points raised by the Associations’ letter, we offer these additional comments regarding uniform permitting and streamlining considerations that we think would improve the General Permit to achieve the goals set forth in enabling legislation:

Comments on draft *General Landscape Irrigation Permit*

April 27, 2009

Page 2 of 2

- Provide comparable Best Management Practices (BMP) regulation for runoff, ponding and aerosols of all landscape irrigation water supplies including storm water, potable water and recycled water. Runoff and ponding controls should not be limited to recycled water. Efficient irrigation practices should apply to all irrigation projects regardless of water supply.
- Allow a greater level of delegation of state health authority to local water purveyors for simple irrigation projects by eliminating the requirement for approval of permit holder rules and regulations.
- Allow a greater emphasis on self certification for some or all site inspections for routine irrigation projects.

Finally, we have the following specific additional comments to the General Permit sections noted:

- Prohibition 12, regarding installation of hose bibs should allow hose bib installation in controlled areas and under special circumstances if the installation is in conformance with Specification 10.
- Specification 9, regarding horizontal and vertical pipe separations should be deleted since it applies to main lines and is not practical for irrigation site piping.
- The recommendation that all sprinkler heads be uniform in brand, model and nozzle size is unrealistic given current irrigation practices.

Thank You for taking the time to review and consider our comments.

Sincerely,

INLAND EMPIRE UTILITIES AGENCY



Thomas A. Love  
Executive Manager of Engineering